

**Pearce, Jennifer**

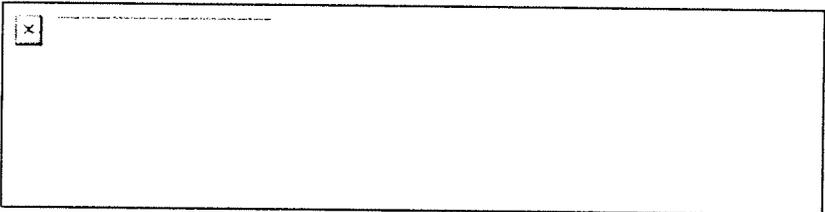
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**From:** Chad Edwards <cedwards@hepaco.com>  
**Sent:** Wednesday, February 12, 2014 12:18 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC  
**Attachments:** Food Lion #2217 Grease Interceptor Emergency Removal Work Plan.pdf

Mr. Feely,

I have attached the proposed Grease Interceptor Work Plan for your review. Please let me know if you have any comments/concerns or need any additional information.

Thank you and safe travels.



**Chad B. Edwards**

Project Manager  
HEPACO, LLC  
P.O. Box 26308  
Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
Fax: 704-598-9224

**www.hepaco.com**

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\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*



February 10, 2014

Eddie Hawks  
Corporate Safety Manager  
Delhaize America Shared Services Group, LLC.  
PO Box 1330  
Salisbury, NC 28147

SUBJECT: Grease Interceptor Emergency Closure Work Plan (Food Lion #2217)

Dear Mr. Hawks:

Food Lion operates a grocery store (#2217) located at 6430 W. Sugar Creek Road, Charlotte, NC 28269 (Mecklenburg County) that was recently vandalized by the introduction of polychlorinated biphenyls (PCBs)-containing oils and sanitary waste into the grease interceptor located at the rear of the store. Although Food Lion is not responsible for the presence of PCBs in the grease interceptor they have been required to have the grease interceptor and associated pipeline appropriately cleaned of PCB or completely replaced as they utilize the grease interceptor during store operations. Upon completion of cleaning and/or removal procedures, Food Lion will also be responsible for arranging proper transportation and disposal of the PCBs. A summary of the sampling activities conducted at the site in order to characterize the PCB-contamination is provided below. Additionally, the plan for emergency removal and replacement of the grease interceptor is described below.

### **Summary of Sampling Activities**

Sampling was conducted on February 7, 2014 to determine the extent of contamination resulting from the unauthorized PCB disposal. HEPACO collected samples of the contents of the grease interceptor, The samples were submitted to Pace Analytical Laboratories Inc., a NELAP Accredited laboratory, for analysis of PCBs by US EPA Method 8082A.

Samples were collected from the two compartments in the grease interceptor separately and at three levels within the interceptor, the grease layer, the middle height of the liquid, and liquid at the bottom of the tank. The two grease layer samples ranged in PCB concentration from 1.68 to 25.1 mg/L. The liquid samples in the middle depth ranged from 1.13 to 17.1 mg/L and the liquid samples from the bottom ranged from 430 to 3,410 mg/L. These concentrations require that the



materials removed from this tank be transported to a facility licensed to dispose of Toxic Substances Control Act (TSCA)-regulated waste. Charlotte-Mecklenburg Utility Division sampled the grease interceptor and determined that there were also levels of trichlorobenzene present in the liquids of the interceptor. Additional sampling to determine if any additional contaminants of concern are present will be required in order to determine final waste characterization.

### **Regulatory Requirements for PCB Contaminated Sites**

PCB contaminated materials must contain PCBs at concentrations of less than 1.0 parts per million (ppm or mg/kg) in order to be completely unregulated for disposal off-site without an approval from US EPA. Preliminary sampling results indicate that PCB concentrations are greater than 50 ppm.

TSCA regulations and policy statements offer several basic approaches for the cleanup and disposal of PCB contaminated material (e.g., soil, concrete) resulting from spills or other releases of PCBs into the environment, which can be used during an emergency response. These approaches are regulatory and are cited in 40 CFR 761.61. The approach under US EPA's "PCB Spill Cleanup Policy," is an enforcement policy and is codified in 40 CFR 761 subpart G.

With regard to the regulatory approaches, the self-implementing on-site cleanup and disposal of PCB remediation waste approach at 40 CFR 761.61(a) (self-implementing approach) and the risk-based disposal approval approach at 40 CFR 761.61(c) (risk-based approach), address both cleanup and disposal.

For the purposes of this emergency removal action, the risk-based approach will be utilized, as applicable. Additionally, 40 CFR 761.61 indicates that specific requirements for PCB remediation waste do not prohibit quick action to protect human health and the environment through the implementation of temporary emergency measures to prevent, treat, or contain further releases or mitigate migration to the environment of PCBs or PCB-contaminated materials. However, each approach differs with regard to its sampling, cleanup, and disposal requirements, thereby offering a range of options. The decision of which approach to apply depends upon site characteristics, land use, how much time and resources are available for cleaning up the release, and other factors.

For the Food Lion site, PCB waste has been pumped out of the grease interceptor and placed into 55-gallon metal drums for transport and disposal. Containers will be



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appropriately labeled and will be disposed of following the procedures described below. Remediation activities for the grease interceptor are described in the following section.

### **Safety and Health Procedures**

The removal of materials and decontamination of the equipment is subject to coverage under the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations. All employees performing work on this site associated with the removal of PCB materials and the decontamination of the grease interceptor must have current certifications for the 40-hour HAZWOPER training.

Primary routes of entry into the body for PCB are ingestion and inhalation. Because skin exposure often leads to accidental ingestion, control of skin exposure is also required. For this reason, workers doing tasks that may lead to exposure will be required to wear Saranex coveralls with head covering as necessary, PVC/Chemical Boots, two layers of gloves, and hard hat. When entering a confined space where elevated concentrations of PCB might occur, a full-face air purifying respirator outfitted with organic vapor filter cartridges is also required. HEPACO personnel will follow additional safety equipment requirements as dictated by their internal procedures.

The grease interceptor is a permit-required confined space and HEPACO personnel will follow their company procedures with regard to entering a permit-required confined space.

Prior to HEPACO personnel entering the grease interceptor, power ventilation will be provided to ensure a safe atmosphere for working conditions. The atmosphere will be tested and a confined space entry permit will be issued, consistent with HEPACO work practices and OSHA regulations. A tripod man lift will be used with a steel cable retrieval line to tether the worker's harness to allow retrieval of the worker from the confined space. An attendant will be present at all times a worker is in the confined space, performing constant monitoring of ambient air conditions.

If excavations greater than four feet are required and people will enter the excavation, the OSHA regulations regarding excavation safety will be adhered to. When the grease interceptor is demolished and a new grease interceptor is installed, appropriate excavation safety procedures will be followed with regard to the safety of personnel entering the excavation.

### **Grease Interceptor Emergency Removal/Closure Procedures**



The grease interceptor will be initially emptied of the PCB contaminated contents using a vacuum truck and/or pump. After removal of the contents, the grease interceptor will be cleaned with pressurized hot water to remove loose residuals and the rinsate. This rinsate will then be collected into the vacuum truck, subsequently drummed, and consolidated with the other wastes. HEPACO personnel will enter the grease interceptor and scrape the walls and floor of any remaining residues.

The next step will be to assess the integrity of the influent and effluent lines to evaluate whether there is a potential for additional risk of soil contamination that arises from the use of a jet rod cleaning unit in these lines. If voids or breaches are observed, then the line with the observed fault will be excavated and replaced, as necessary.

The effluent plumbing system for the shopping center is covered by 4 inches of asphalt. HEPACO will clean the line from the grease interceptor using a jet rod machine from the grease interceptor to the furthest point that can be reached with the unit. The jet rod is designed to pressurize a liquid cleaning solution and pull it back to the point where the jet rod was placed inside the pipeline. HEPACO will use a degreasing cleaner to wash the discharge line from the furthest point that can be reached back to the tank. This should adequately decontaminate the PVC lines for purposes of eliminating the source of PCB entering the public sewer system.

Confirmation, wipe samples from the influent and effluent lines will be collected consistent with US EPA policy (US EPA, Wipe Sampling and Double Wash/Rinse Cleanup as Recommended by the Environmental Protection Agency PCB Spill Cleanup Policy, June 23, 1987, Revised and Clarified on April 18, 1991) and samples will be submitted to Pace Analytical Laboratory, Inc. for PCB analysis by US EPA Method 8082A.

Once the integrity of the influent line has been verified, the jet rod cleaner will be used to clean from the influent line from the final clean out inside the building to the tie with the temporary by-pass line. To do this, the first action will be to uncover the temporary by-pass line. The jet rod will be used to clean approximately 10 feet up the influent line to the grease interceptor. Once cleaning is complete, new PVC pipe will be used to reconnect for temporary use. The store can resume normal activity levels once this line is connected again. The section of temporary by-pass line removed will be disposed of as PCB remediation waste.



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After the influent line is cleaned, the effluent line will be cleaned. The jet rod unit will be inserted into the effluent line as far as it will go and the line will be cleaned back to the grease interceptor.

Once the effluent line is cleaned and the walls are scraped, the inside of the tank will be cleaned using a pressurized sprayer and a degreaser will be applied to remove the oily residue from the walls. After sufficient contact time, the walls will be rinsed with water to remove the degreaser. The cleaning step will be repeated, as necessary, until the walls of the unit appear to be free of accumulated oils and greases.

Liquids generated by the cleaning process will be collected into the vacuum truck and subsequently drummed for proper disposal with other fluids that are removed from the grease interceptor.

Samples of the concrete will be collected using a 1 inch drill bit in a hammer drill. Care will be taken to limit the depth of the drilled hole to ½ inch or less of depth. Each sample will require collection of at least 30 grams of sample. Based on information provided by US EPA regarding core sampling, approximately four holes will be drilled at each sample location in order to collect an adequate amount of sample material. These four holes will be drilled within a six inch diameter circle marked at each sample location and the collected material will be composited to form one sample.

### **Future Grease Interceptor Replacement**

Prior to removal of the grease interceptor and confined space entry will be required to sample the influent and effluent lines to determine if any PCB contamination is present.

In order to demolish the tank a backhoe mounted jack hammer tip or excavator mounted jack hammer will be required. The tank will be broken into pieces small enough to be staged in a hazardous waste roll-off container for disposal in accordance with disposal procedures described in the following section.

Once the tank is out of the excavation, any visibly contaminated soils will be excavated and placed into the hazardous waste roll-off and staged for disposal in accordance with disposal procedures described in the following section.

Upon removal of the grease interceptor, confirmation sampling will be conducted on the underlying soils to confirm PCB concentrations are less than one ppm (1.0



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mg/kg). Two grab samples will be collected from the soil at the bottom of the pit. Two soil samples will also be collected from each of the four sidewalls of the pit. The excavator will excavate soils from the bottom and sidewalls and each of the samples will be collected from the excavator scoop. Sampling personnel will not enter the pit for sample collection. Samples will be submitted to Pace Analytical Laboratory, Inc. for PCB analysis by US EPA Method 8082A.

The excavation will be covered and barricaded to prevent unauthorized entry and the excavation will be left open until the results from the confirmation samples are received. Excavation of bottom and sidewall soils will continue until confirmation samples result in PCB concentrations less than one ppm.

Upon confirmation of PCB concentrations in the soils and inlet line are below one ppm, a new grease interceptor will be installed in the same location by a plumbing contractor. The temporary by-pass will be disconnected and the inlet line will be routed to the new grease interceptor.

### **Influent and Effluent Lines**

If the confirmation sample from the influent or discharge line from the grease interceptor shows that the line is not adequately clean (wipe test greater than 10  $\mu\text{g}/100\text{ cm}^2$ ), the concrete over the line will be cut and removed and the line will be demolished and replaced. Removal of the line will be done by HEPACO and replacement of the line will be made by a licensed plumbing contractor.

### **Equipment Decontamination Procedures**

Sampling equipment decontamination will be performed in accordance with procedures described in the site Health and Safety Plan. Equipment will be decontaminated in accordance with HEPACO procedures and consistent with US EPA policy (US EPA, Wipe Sampling and Double Wash/Rinse Cleanup as Recommended by the Environmental Protection Agency PCB Spill Cleanup Policy, June 23, 1987, Revised and Clarified on April 18, 1991). Disposable personnel protective equipment, sampling equipment and related disposal items will be placed into a plastic trash bag and placed into a steel drum, labeled and sent for disposal with the other PCB remediation waste associated with this site.

### **PCB Derived Waste Disposal Procedures**

PCB waste will be transferred to 55-gallon drums and held until confirmation samples demonstrate that sufficient soils have been removed and the excavation is ready for replacement of the grease interceptor. Demolition materials will be contained in a plastic-lined hazardous waste roll-off container. Investigation and



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demolition waste is assumed to contain PCB concentrations greater than 50 ppm for disposal purposes. Bulk PCB remediation waste at concentrations of 50 ppm or greater must be disposed of in a RCRA Sec. 3004 or 3006 permitted hazardous waste landfill or an approved PCB disposal facility (e.g., incinerator, chemical waste landfill; an approved alternate disposal method or coordinated approval - see 40 CFR §761 .61(a)(5)(i)(B)(2)(iii)). A Uniform Hazardous Waste Manifest must accompany PCB waste at concentrations of 50 ppm or greater ( $\geq 50$  ppm) to any off-site storage or disposal facilities (see 40 CFR §761 .208), except as provided at 40 CFR §§761 .61(a)(5)(i)(B)(2)(ii) and 761.61(a)(5)(v)(A). A signed copy of each manifest must be retained for a period of three years (40 CFR §761 .209(a)).

Waste derived from the grease interceptor removal and closure will be disposed of by Chemical Waste Management in Emelle, Alabama.

Respectfully submitted,  
**HEPACO, LLC**

Chad Edwards  
Project Manager

**Pearce, Jennifer**

---

**From:** Feely, Ken  
**Sent:** Thursday, February 13, 2014 1:34 PM  
**To:** 'cedwards@hepaco.com'  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Chad,

I'm trying to review the plan today. I'll try to get comments back to you by COB today (if not Monday at the latest). I'm off tomorrow and back in the office next Monday.

if you could please email the lab reports documenting HEPACO's sampling efforts that would be helpful.

Thanks.

---

**Ken Feely** | Regional PCB Program Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

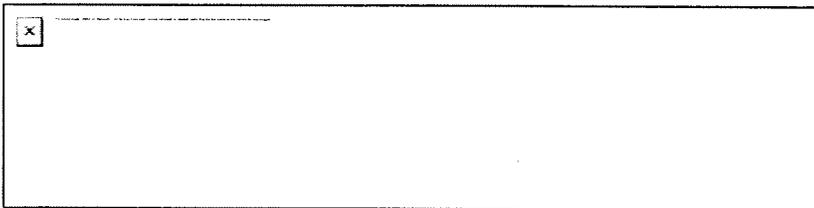
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**From:** Chad Edwards [mailto:[cedwards@hepaco.com](mailto:cedwards@hepaco.com)]  
**Sent:** Wednesday, February 12, 2014 12:18 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Mr. Feely,

I have attached the proposed Grease Interceptor Work Plan for your review. Please let me know if you have any comments/concerns or need any additional information.

Thank you and safe travels.



**Chad B. Edwards**

Project Manager  
HEPACO, LLC  
P.O. Box 26308  
Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
Fax: 704-598-9224

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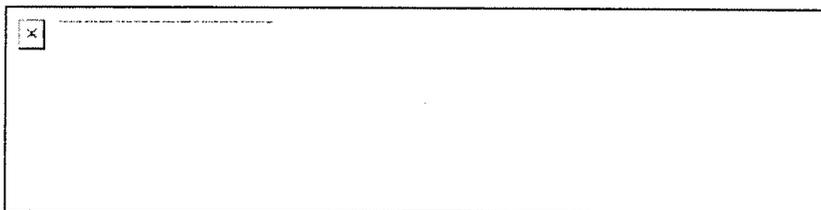
**Pearce, Jennifer**

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**From:** Chad Edwards <cedwards@hepaco.com>  
**Sent:** Thursday, February 13, 2014 3:33 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** Liquid & Concrete Dust Analytical Results  
**Attachments:** Grease Trap Liquid Sample Analytical.pdf; Grease Trap Concrete Dust Sample Analytical.pdf

Ken,

Please find the analytical results.



**Chad B. Edwards**

Project Manager  
HEPACO, LLC  
P.O. Box 26308  
Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
Fax: 704-598-9224

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205 East Meadow Road - Suite A  
Eden, NC 27288  
(336)623-8921

Pace Analytical Services, Inc.  
2225 Riverside Dr.  
Asheville, NC 28804  
(828)254-7176

Pace Analytical Services, Inc.  
9800 Kincey Ave. Suite 100  
Huntersville, NC 28078  
(704)875-9092

February 08, 2014

Chad Edwards  
HEPACO  
PO Box 26308  
Charlotte, NC 28221

RE: Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189152

Dear Chad Edwards:

Enclosed are the analytical results for sample(s) received by the laboratory on February 07, 2014. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

Analyses were performed at the Pace Analytical Services location indicated on the sample analyte page for analysis unless otherwise footnoted.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

*Angela M. Baioni*

Angela Baioni  
angela.baioni@pacelabs.com  
Project Manager

Enclosures

cc: Jay Jones, HEPACO



## REPORT OF LABORATORY ANALYSIS

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205 East Meadow Road - Suite A  
Eden, NC 27288  
(336)623-8921

**Pace Analytical Services, Inc.**  
2225 Riverside Dr.  
Asheville, NC 28804  
(828)254-7176

**Pace Analytical Services, Inc.**  
9800 Kinsey Ave. Suite 100  
Huntersville, NC 28078  
(704)875-9092

## CERTIFICATIONS

Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189152

---

### Charlotte Certification IDs

9800 Kinsey Ave. Ste 100, Huntersville, NC 28078  
North Carolina Drinking Water Certification #: 37706  
North Carolina Field Services Certification #: 5342  
North Carolina Wastewater Certification #: 12  
South Carolina Certification #: 99006001

Florida/NELAP Certification #: E87627  
Kentucky UST Certification #: 84  
West Virginia Certification #: 357  
Virginia/VELAP Certification #: 460221

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(704)875-9092

### SAMPLE ANALYTE COUNT

Project: Food Lion Grease Trap 443.1017

Pace Project No.: 92189152

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
92189152001	Manway South-Top	EPA 8082	EJK	8	PASI-C
92189152002	Manway South-Middle	EPA 8082	EJK	8	PASI-C
92189152003	Manway South-Bottom	EPA 8082	EJK	8	PASI-C
92189152004	Manway North-Top	EPA 8082	EJK	8	PASI-C
92189152005	Manway North-Middle	EPA 8082	EJK	8	PASI-C
92189152006	Manway North-Bottom	EPA 8082	EJK	8	PASI-C

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 Asheville, NC 28804  
 (828)254-7176

Pace Analytical Services, Inc.  
 9800 Kincey Ave. Suite 100  
 Huntersville, NC 28078  
 (704)875-9092

### SUMMARY OF DETECTION

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Lab Sample ID	Client Sample ID	Result	Units	Report Limit	Analyzed	Qualifiers
Method	Parameters					
<b>92189152001</b>	<b>Manway South-Top</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	3010	ug/L	50.0	02/08/14 14:19	E
EPA 8082	PCB-1260 (Aroclor 1260)	1910	ug/L	50.0	02/08/14 14:19	E
<b>92189152002</b>	<b>Manway South-Middle</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	4160	ug/L	50.0	02/08/14 14:40	E
EPA 8082	PCB-1260 (Aroclor 1260)	2600	ug/L	50.0	02/08/14 14:40	E
<b>92189152003</b>	<b>Manway South-Bottom</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	693000	ug/L	10200	02/08/14 17:19	E
EPA 8082	PCB-1260 (Aroclor 1260)	430000	ug/L	10200	02/08/14 17:19	E
<b>92189152004</b>	<b>Manway North-Top</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	25100	ug/L	51.5	02/08/14 15:22	E
EPA 8082	PCB-1260 (Aroclor 1260)	16800	ug/L	51.5	02/08/14 15:22	E
<b>92189152005</b>	<b>Manway North-Middle</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	17100	ug/L	50.0	02/08/14 15:43	E
EPA 8082	PCB-1260 (Aroclor 1260)	11300	ug/L	50.0	02/08/14 15:43	E
<b>92189152006</b>	<b>Manway North-Bottom</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	3410000	ug/L	41700	02/08/14 17:40	E
EPA 8082	PCB-1260 (Aroclor 1260)	2170000	ug/L	41700	02/08/14 17:40	E

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway South-Top		Lab ID: 92189152001	Collected: 02/07/14 13:25	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>3010</b>	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	11097-69-1	E
PCB-1260 (Aroclor 1260)	<b>1910</b>	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:19	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	100	02/07/14 15:15	02/08/14 14:19	2051-24-3	S4

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway South-Middle		Lab ID: 92189152002	Collected: 02/07/14 13:20	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>3082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>4160</b>	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	11097-69-1	E
PCB-1260 (Aroclor 1260)	<b>2600</b>	ug/L	50.0	100	02/07/14 15:15	02/08/14 14:40	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	100	02/07/14 15:15	02/08/14 14:40	2051-24-3	S4

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway South-Bottom		Lab ID: 92189152003	Collected: 02/07/14 13:15	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>693000</b>	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	11097-69-1	E
PCB-1260 (Aroclor 1260)	<b>430000</b>	ug/L	10200	20000	02/07/14 15:15	02/08/14 17:19	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	20000	02/07/14 15:15	02/08/14 17:19	2051-24-3	S4

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway North-Top		Lab ID: 92189152004	Collected: 02/07/14 13:40	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>25100</b>	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	11097-69-1	E
PCB-1260 (Aroclor 1260)	<b>16800</b>	ug/L	51.5	100	02/07/14 15:15	02/08/14 15:22	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	100	02/07/14 15:15	02/08/14 15:22	2051-24-3	S4

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway North-Middle		Lab ID: 92189152005	Collected: 02/07/14 13:38	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	12672-29-6	
PCB-1254 (Aroclor 1254)	17100	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	11097-69-1	E
PCB-1260 (Aroclor 1260)	11300	ug/L	50.0	100	02/07/14 15:15	02/08/14 15:43	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	100	02/07/14 15:15	02/08/14 15:43	2051-24-3	S4

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### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Sample: Manway North-Bottom		Lab ID: 92189152006	Collected: 02/07/14 13:45	Received: 02/07/14 14:50	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3510						
PCB-1016 (Aroclor 1016)	ND	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>3410000</b>	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	11097-69-1	E
PCB-1260 (Aroclor 1260)	<b>2170000</b>	ug/L	41700	20000	02/07/14 15:15	02/08/14 17:40	11096-82-5	E
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		10-132	20000	02/07/14 15:15	02/08/14 17:40	2051-24-3	S4

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**QUALITY CONTROL DATA**

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

QC Batch: OEXT/25828 Analysis Method: EPA 8082  
 QC Batch Method: EPA 3510 Analysis Description: 8082 GCS PCB  
 Associated Lab Samples: 92189152001, 92189152002, 92189152003, 92189152004, 92189152005, 92189152006

METHOD BLANK: 1134941 Matrix: Water  
 Associated Lab Samples: 92189152001, 92189152002, 92189152003, 92189152004, 92189152005, 92189152006

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1221 (Aroclor 1221)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1232 (Aroclor 1232)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1242 (Aroclor 1242)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1248 (Aroclor 1248)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1254 (Aroclor 1254)	ug/L	ND	0.50	02/07/14 16:38	
PCB-1260 (Aroclor 1260)	ug/L	ND	0.50	02/07/14 16:38	
Decachlorobiphenyl (S)	%	69	10-132	02/07/14 16:38	

LABORATORY CONTROL SAMPLE & LCSD: 1134942 1134943

Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
PCB-1016 (Aroclor 1016)	ug/L	5	3.5	3.7	69	74	50-150	6	30	
PCB-1260 (Aroclor 1260)	ug/L	5	4.3	3.7	86	75	50-150	14	30	
Decachlorobiphenyl (S)	%				77	73	10-132			

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## QUALIFIERS

Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189152

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### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PRL - Pace Reporting Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Acid preservation may not be appropriate for 2-Chloroethylvinyl ether, Styrene, and Vinyl chloride.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-C Pace Analytical Services - Charlotte

### ANALYTE QUALIFIERS

E Analyte concentration exceeded the calibration range. The reported result is estimated.

S4 Surrogate recovery not evaluated against control limits due to sample dilution.

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**QUALITY CONTROL DATA CROSS REFERENCE TABLE**

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189152

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
92189152001	Manway South-Top	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609
92189152002	Manway South-Middle	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609
92189152003	Manway South-Bottom	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609
92189152004	Manway North-Top	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609
92189152005	Manway North-Middle	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609
92189152006	Manway North-Bottom	EPA 3510	OEXT/25828	EPA 8082	GCSV/16609

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**CHAIN-OF-CUSTODY / Analytical Request Document**  
The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately.

Section A Required Client Information: Section B Required Project Information: Section C Invoice Information:

Company Name: <b>HEPACO</b>	Report To: <b>Clad Edwards</b>	Attention: <b>Clad Edwards</b>	Page: _____ of _____
Address: <b>2711 Burch Drive</b>	Company Name: <b>Jay Jones Jones @ Hepaco.com</b>	Address: <b>HEPACO</b>	Page: <b>1799401</b>
City/State: <b>Charlotte NC 28269</b>	Project Name: <b>Food Lion Grease Trap</b>	Site Location: <b>Charlotte NC</b>	REGULATORY AGENCY: <b>NC DENR</b>
Contact: <b>Edward Jones @ Hepaco.com</b>	Project Number: <b>443.1017</b>	Requested Analysis Filtered (Y/N): <b>Y</b>	GROUND WATER: <input type="checkbox"/> DRINKING WATER: <input checked="" type="checkbox"/> OTHER: <input type="checkbox"/>
Reference Date: <b>8/1/14</b>	Matrix Code: <b>WU G</b>	Residual Chlorine (Y/N): <b>Y</b>	Site Location: <b>Charlotte NC</b>

ITEM #	Section B Required Client Information	Section C Invoice Information	Matrix Code	Sample Type (G=GRAB C=COMP)	COLLECTED			Sample Temp at Collection	# of Containers	Preservatives	Analysis Test	Requested Analysis Filtered (Y/N)	Pace Project No./Lab ID
					DATE	TIME	DATE						
1	Manway South - Top	WU G	WU G	2/2/14	1325	2	2 X					92189152	
2	Manway South - Middle	WU G	WU G	2/2/14	1320	2	2 X						
3	Manway South - Bottom	WU G	WU G	2/2/14	1315	2	2 X						
4	Manway North - Top	WU G	WU G	2/3/14	1340	2	2 X						
5	Manway North - Middle	WU G	WU G	2/3/14	1338	2	2 X						
6	Manway North - Bottom	WU G	WU G	2/3/14	1345	2	2 X						
7													
8													
9													
10													
11													
12													

REINQUISHED BY / AFFILIATION: <b>Jay Jones / HEPACO</b>	DATE: <b>2/3/14</b>	TIME: <b>1450</b>	ACCEPTED BY / AFFILIATION: <b>LIBALONUM DRCE</b>	DATE: <b>2/24/14</b>	TIME: <b>1450</b>
SAMPLER NAME AND SIGNATURE					
PRINT Name of SAMPLER: <b>Jay Jones</b>		DATE Stamped (MM/DD/YYYY): <b>02/07/14</b>		Temp in C	
SIGNATURE of SAMPLER: <i>Jay Jones</i>		DATE Stamped (MM/DD/YYYY): <b>02/07/14</b>		Received on by (Y/N)	
				Custody Sealed Cooler (Y/N)	
				Samples In cool (Y/N)	



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February 08, 2014

Chad Edwards  
HEPACO  
PO Box 26308  
Charlotte, NC 28221

RE: Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189206

Dear Chad Edwards:

Enclosed are the analytical results for sample(s) received by the laboratory on February 08, 2014. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

Analyses were performed at the Pace Analytical Services location indicated on the sample analyte page for analysis unless otherwise footnoted.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Angela Baioni  
angela.baioni@pacelabs.com  
Project Manager

Enclosures

cc: Jay Jones, HEPACO



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## CERTIFICATIONS

Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189206

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### Charlotte Certification IDs

9800 Kincey Ave. Ste 100, Huntersville, NC 28078  
North Carolina Drinking Water Certification #: 37706  
North Carolina Field Services Certification #: 5342  
North Carolina Wastewater Certification #: 12  
South Carolina Certification #: 99006001

Florida/NELAP Certification #: E87627  
Kentucky UST Certification #: 84  
West Virginia Certification #: 357  
Virginia/VELAP Certification #: 460221

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### SAMPLE ANALYTE COUNT

Project: Food Lion Grease Trap 443.1017

Pace Project No.: 92189206

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
92189206001	Manway North Floor	EPA 8082	EJK	8	PASI-C
92189206002	Manway South Floor	EPA 8082	EJK	8	PASI-C

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### SUMMARY OF DETECTION

Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189206

Lab Sample ID Method	Client Sample ID Parameters	Result	Units	Report Limit	Analyzed	Qualifiers
<b>92189206001</b>	<b>Manway North Floor</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	11700 ug/kg		5160	02/08/14 12:35	
EPA 8082	PCB-1260 (Aroclor 1260)	6680 ug/kg		5160	02/08/14 12:35	
<b>92189206002</b>	<b>Manway South Floor</b>					
EPA 8082	PCB-1254 (Aroclor 1254)	14800 ug/kg		6600	02/08/14 12:56	
EPA 8082	PCB-1260 (Aroclor 1260)	8810 ug/kg		6600	02/08/14 12:56	

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 Huntersville, NC 28078  
 (704)875-9092

### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017

Pace Project No.: 92189206

Sample: Manway North Floor Lab ID: 92189206001 Collected: 02/07/14 11:05 Received: 02/08/14 09:40 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3546						
PCB-1016 (Aroclor 1016)	ND	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	12672-29-6	
PCB-1254 (Aroclor 1254)	11700	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	11097-69-1	
PCB-1260 (Aroclor 1260)	6680	ug/kg	5160	100	02/08/14 10:06	02/08/14 12:35	11096-82-5	
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		21-132	100	02/08/14 10:06	02/08/14 12:35	2051-24-3	S4

### REPORT OF LABORATORY ANALYSIS

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 205 East Meadow Road - Suite A  
 Eden, NC 27288  
 (336)623-8921

Pace Analytical Services, Inc.  
 2225 Riverside Dr.  
 Asheville, NC 28804  
 (828)254-7176

Pace Analytical Services, Inc.  
 9800 Kincey Ave. Suite 100  
 Huntersville, NC 28078  
 (704)875-9092

### ANALYTICAL RESULTS

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189206

Sample: Manway South Floor Lab ID: 92189206002 Collected: 02/07/14 11:55 Received: 02/08/14 09:40 Matrix: Solid

Results reported on a "wet-weight" basis

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
<b>8082 GCS PCB</b>		Analytical Method: EPA 8082 Preparation Method: EPA 3546						
PCB-1016 (Aroclor 1016)	ND	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	11141-16-5	
PCB-1242 (Aroclor 1242)	ND	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	12672-29-6	
PCB-1254 (Aroclor 1254)	<b>14800</b>	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	11097-69-1	
PCB-1260 (Aroclor 1260)	<b>8810</b>	ug/kg	6600	100	02/08/14 10:06	02/08/14 12:56	11096-82-5	
<b>Surrogates</b>								
Decachlorobiphenyl (S)	0 %		21-132	100	02/08/14 10:06	02/08/14 12:56	2051-24-3	S4

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 Huntersville, NC 28078  
 (704)875-9092

### QUALITY CONTROL DATA

Project: Food Lion Grease Trap 443.1017  
 Pace Project No.: 92189206

QC Batch: OEXT/25845 Analysis Method: EPA 8082  
 QC Batch Method: EPA 3546 Analysis Description: 8082 GCS PCB  
 Associated Lab Samples: 92189206001, 92189206002

METHOD BLANK: 1135669 Matrix: Solid  
 Associated Lab Samples: 92189206001, 92189206002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1221 (Aroclor 1221)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1232 (Aroclor 1232)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1242 (Aroclor 1242)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1248 (Aroclor 1248)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1254 (Aroclor 1254)	ug/kg	ND	33.0	02/08/14 13:17	
PCB-1260 (Aroclor 1260)	ug/kg	ND	33.0	02/08/14 13:17	
Decachlorobiphenyl (S)	%	68	21-132	02/08/14 13:17	

LABORATORY CONTROL SAMPLE & LCSD: 1135670		1135671								
Parameter	Units	Spike Conc.	LCS Result	LCSD Result	LCS % Rec	LCSD % Rec	% Rec Limits	RPD	Max RPD	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	167	103	102	62	61	49-110	2	30	
PCB-1260 (Aroclor 1260)	ug/kg	167	105	103	63	62	50-110	2	30	
Decachlorobiphenyl (S)	%				70	67	21-132			

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## QUALIFIERS

Project: Food Lion Grease Trap 443.1017

Pace Project No.: 92189206

---

### DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PRL - Pace Reporting Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Acid preservation may not be appropriate for 2-Chloroethylvinyl ether, Styrene, and Vinyl chloride.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

### LABORATORIES

PASI-C Pace Analytical Services - Charlotte

### ANALYTE QUALIFIERS

S4 Surrogate recovery not evaluated against control limits due to sample dilution.

## REPORT OF LABORATORY ANALYSIS

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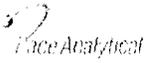
### QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Food Lion Grease Trap 443.1017  
Pace Project No.: 92189206

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
92189206001	Manway North Floor	EPA 3546	OEXT/25845	EPA 8082	GCSV/16621
92189206002	Manway South Floor	EPA 3546	OEXT/25845	EPA 8082	GCSV/16621

### REPORT OF LABORATORY ANALYSIS

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	Document Name: <b>Sample Condition Upon Receipt (SCUR)</b>	Document Revised: December 10, 2010 Page 1 of 2
	Document Number: <b>F-CHR-CS-03-rev.13</b>	Issuing Authority: Pace Huntersville Quality Office

Client Name: Hepaco

Courier:  Fed Ex  UPS  USPS  Client  Commercial  Pace Other \_\_\_\_\_

Custody Seal on Cooler/Box Present:  yes  no    Seals intact:  yes  no

Optional
Proj. Due Date:
Proj. Name:

Packing Material:  Bubble Wrap  Bubble Bags  None  Other \_\_\_\_\_

Thermometer Used: IR Gun T1102 **(T1301)**    Type of Ice: Wet Blue **(None)**     Samples on ice, cooling process has begun

Temp Correction Factor    T1102: No Correction    T1301: No Correction

Corrected Cooler Temp.: 8.9 °C    Biological Tissue is Frozen: Yes No N/A

Date and Initials of person examining content: <u>M 2/8</u>
---

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler Name & Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples Arrived within Hold Time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	6.
Rush Turn Around Time Requested:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
-Pace Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Filtered volume received for Dissolved tests	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Sample Labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	12.
-Includes date/time/ID/Analysis Matrix: <b>(N/A)</b>		
All containers needing preservation have been checked.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
All containers needing preservation are found to be in compliance with EPA recommendation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
exceptions: VOA, coliform, TOC, O&G, WI-DRO (water)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Samples checked for dechlorination:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	14.
Headspace in VOA Vials (>6mm):	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	15.
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	16.
Trip Blank Custody Seals Present	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	
Pace Trip Blank Lot # (if purchased): _____		

Client Notification/ Resolution: \_\_\_\_\_ Field Data Required? Y / N

Person Contacted: \_\_\_\_\_ Date/Time: \_\_\_\_\_

Comments/ Resolution: \_\_\_\_\_

SCURF Review: <u>HMB</u>	Date: <u>2-8-14</u>
SRF Review: <u>EW</u>	Date: <u>2/8/14</u>

Note: Whenever there is a discrepancy affecting North Carolina compliance samples, a copy of this form will be sent to the North Carolina DEHNR Certification Office ( i.e. out of hold, incorrect preservative, out of temp, incorrect containers)

Place label here  
**WO#: 92189206**







## Pearce, Jennifer

---

**From:** Feely, Ken  
**Sent:** Friday, February 14, 2014 8:23 AM  
**To:** 'cedwards@hepaco.com'  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Thanks Chad....forgot Monday was President's Day. Let's talk Tuesday.

---

**Ken Feely** | Regional PCB Program Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

---

**From:** Chad Edwards [<mailto:cedwards@hepaco.com>]  
**Sent:** Thursday, February 13, 2014 3:39 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Ken,

- The GI will be removed. The levels that Mecklenburg County requires are a non-detect for PCB's.
- We are working for Food Lion which is under the " Delhaize America" umbrella
- Orange Appeal w/delimeamine by Marchem Products

Thank you and I will be in touch Monday morning.



**Chad B. Edwards**  
Project Manager  
HEPACO, LLC  
P.O. Box 26308  
Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
Fax: 704-598-9224

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 Please consider the environment before printing this mail.

**From:** Feely, Ken [<mailto:Feely.Ken@epa.gov>]  
**Sent:** Thursday, February 13, 2014 3:22 PM  
**To:** [cedwards@hepaco.com](mailto:cedwards@hepaco.com)  
**Cc:** McCurry, Doug  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Chad,

A few questions/observations before I compile comments:

- Is it a foregone conclusion that the GI will be removed and replaced? If so, and all IDW and demo debris will be disposed of at Emelle, the concrete sampling is not necessary. If decontamination of the GI is to be attempted, then a 24-hour integrity test of the tank should be performed to determine if the tank is leaking (most of them we've dealt with to date seem to be). If leaking, replacement will likely be necessary in order to assess potential soil contamination.
- Who is the owner of the property (Delhaize America)? Just wondered if you're working for the property owner or Food Lion.
- Seems that the plan is to do some cleaning prior to breaking up and removing the tank (good idea). Wondered what degreaser you were planning to use.
- Liquid PCB remediation waste should be shipped for incineration immediately as the regulations provide no option for temporary on-site storage. If immediate shipment is not practicable, EPA recommends securing the waste in some sort of secondary containment. Bulk PCB remediation waste and PCB cleanup waste can be stored temporarily on-site in containers for up to 30 days. EPA recommends that these also be secured and inspected daily.
- Just FYI, this cleanup is not governed by the Spill Cleanup Policy
- By regulation, approval of a 761.61(c) risk-based cleanup approval is required before cleanup can proceed. Under these unusual circumstances, we are allowing contractors to proceed "at risk" prior to receiving the formal approval.

I'm approaching the end of my work day here and will be out of the office tomorrow. If you have time to respond to the above, perhaps we can discuss next Monday morning.

Have a good weekend.

---

**Ken Feely** | Regional PCB Program Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

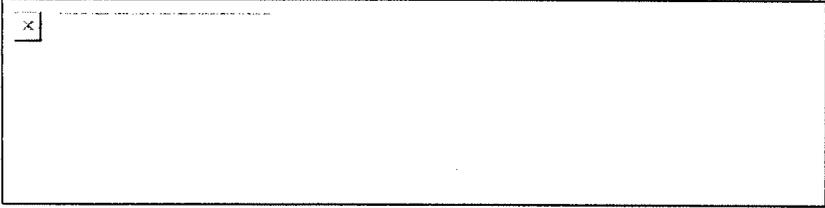
---

**From:** Chad Edwards [<mailto:cedwards@hepaco.com>]  
**Sent:** Wednesday, February 12, 2014 12:18 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Mr. Feely,

I have attached the proposed Grease Interceptor Work Plan for your review. Please let me know if you have any comments/concerns or need any additional information.

Thank you and safe travels.



**Chad B. Edwards**

Project Manager  
HEPACO, LLC  
P.O. Box 26308  
Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
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This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

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For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*



## Pearce, Jennifer

---

**From:** Feely, Ken  
**Sent:** Wednesday, February 12, 2014 12:37 PM  
**To:** McCurry, Doug  
**Subject:** FW: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC  
**Attachments:** Food Lion #2217 Grease Interceptor Emergency Removal Work Plan.pdf

Probably will try to review today. Comments welcome.

---

**Ken Feely** | Regional PCB Program Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

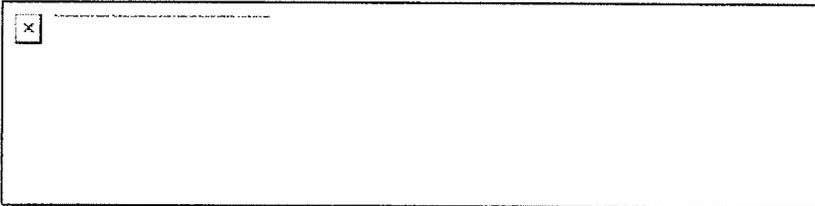
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**Sent:** Wednesday, February 12, 2014 12:18 PM  
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**Cc:** 'Hawks, Eddie'  
**Subject:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

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Thank you and safe travels.



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extension and resend the Email with the renamed attachment. After  
receiving the revised Email, containing the renamed attachment, you can  
rename the file extension to its correct name.

For further information, please contact the EPA Call Center at  
(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*



February 10, 2014

Eddie Hawks  
Corporate Safety Manager  
Delhaize America Shared Services Group, LLC.  
PO Box 1330  
Salisbury, NC 28147

SUBJECT: Grease Interceptor Emergency Closure Work Plan (Food Lion #2217)

Dear Mr. Hawks:

Food Lion operates a grocery store (#2217) located at 6430 W. Sugar Creek Road, Charlotte, NC 28269 (Mecklenburg County) that was recently vandalized by the introduction of polychlorinated biphenyls (PCBs)-containing oils and sanitary waste into the grease interceptor located at the rear of the store. Although Food Lion is not responsible for the presence of PCBs in the grease interceptor they have been required to have the grease interceptor and associated pipeline appropriately cleaned of PCB or completely replaced as they utilize the grease interceptor during store operations. Upon completion of cleaning and/or removal procedures, Food Lion will also be responsible for arranging proper transportation and disposal of the PCBs. A summary of the sampling activities conducted at the site in order to characterize the PCB-contamination is provided below. Additionally, the plan for emergency removal and replacement of the grease interceptor is described below.

### **Summary of Sampling Activities**

Sampling was conducted on February 7, 2014 to determine the extent of contamination resulting from the unauthorized PCB disposal. HEPACO collected samples of the contents of the grease interceptor, The samples were submitted to Pace Analytical Laboratories Inc., a NELAP Accredited laboratory, for analysis of PCBs by US EPA Method 8082A.

Samples were collected from the two compartments in the grease interceptor separately and at three levels within the interceptor, the grease layer, the middle height of the liquid, and liquid at the bottom of the tank. The two grease layer samples ranged in PCB concentration from 1.68 to 25.1 mg/L. The liquid samples in the middle depth ranged from 1.13 to 17.1 mg/L and the liquid samples from the bottom ranged from 430 to 3,410 mg/L. These concentrations require that the



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materials removed from this tank be transported to a facility licensed to dispose of Toxic Substances Control Act (TSCA)-regulated waste. Charlotte-Mecklenburg Utility Division sampled the grease interceptor and determined that there were also levels of trichlorobenzene present in the liquids of the interceptor. Additional sampling to determine if any additional contaminants of concern are present will be required in order to determine final waste characterization.

### **Regulatory Requirements for PCB Contaminated Sites**

PCB contaminated materials must contain PCBs at concentrations of less than 1.0 parts per million (ppm or mg/kg) in order to be completely unregulated for disposal off-site without an approval from US EPA. Preliminary sampling results indicate that PCB concentrations are greater than 50 ppm.

TSCA regulations and policy statements offer several basic approaches for the cleanup and disposal of PCB contaminated material (e.g., soil, concrete) resulting from spills or other releases of PCBs into the environment, which can be used during an emergency response. These approaches are regulatory and are cited in 40 CFR 761.61. The approach under US EPA's "PCB Spill Cleanup Policy," is an enforcement policy and is codified in 40 CFR 761 subpart G.

With regard to the regulatory approaches, the self-implementing on-site cleanup and disposal of PCB remediation waste approach at 40 CFR 761.61(a) (self-implementing approach) and the risk-based disposal approval approach at 40 CFR 761.61(c) (risk-based approach), address both cleanup and disposal.

For the purposes of this emergency removal action, the risk-based approach will be utilized, as applicable. Additionally, 40 CFR 761.61 indicates that specific requirements for PCB remediation waste do not prohibit quick action to protect human health and the environment through the implementation of temporary emergency measures to prevent, treat, or contain further releases or mitigate migration to the environment of PCBs or PCB-contaminated materials. However, each approach differs with regard to its sampling, cleanup, and disposal requirements, thereby offering a range of options. The decision of which approach to apply depends upon site characteristics, land use, how much time and resources are available for cleaning up the release, and other factors.

For the Food Lion site, PCB waste has been pumped out of the grease interceptor and placed into 55-gallon metal drums for transport and disposal. Containers will be



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appropriately labeled and will be disposed of following the procedures described below. Remediation activities for the grease interceptor are described in the following section.

### **Safety and Health Procedures**

The removal of materials and decontamination of the equipment is subject to coverage under the Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations. All employees performing work on this site associated with the removal of PCB materials and the decontamination of the grease interceptor must have current certifications for the 40-hour HAZWOPER training.

Primary routes of entry into the body for PCB are ingestion and inhalation. Because skin exposure often leads to accidental ingestion, control of skin exposure is also required. For this reason, workers doing tasks that may lead to exposure will be required to wear Saranex coveralls with head covering as necessary, PVC/Chemical Boots, two layers of gloves, and hard hat. When entering a confined space where elevated concentrations of PCB might occur, a full-face air purifying respirator outfitted with organic vapor filter cartridges is also required. HEPACO personnel will follow additional safety equipment requirements as dictated by their internal procedures.

The grease interceptor is a permit-required confined space and HEPACO personnel will follow their company procedures with regard to entering a permit-required confined space.

Prior to HEPACO personnel entering the grease interceptor, power ventilation will be provided to ensure a safe atmosphere for working conditions. The atmosphere will be tested and a confined space entry permit will be issued, consistent with HEPACO work practices and OSHA regulations. A tripod man lift will be used with a steel cable retrieval line to tether the worker's harness to allow retrieval of the worker from the confined space. An attendant will be present at all times a worker is in the confined space, performing constant monitoring of ambient air conditions.

If excavations greater than four feet are required and people will enter the excavation, the OSHA regulations regarding excavation safety will be adhered to. When the grease interceptor is demolished and a new grease interceptor is installed, appropriate excavation safety procedures will be followed with regard to the safety of personnel entering the excavation.

### **Grease Interceptor Emergency Removal/Closure Procedures**



The grease interceptor will be initially emptied of the PCB contaminated contents using a vacuum truck and/or pump. After removal of the contents, the grease interceptor will be cleaned with pressurized hot water to remove loose residuals and the rinsate. This rinsate will then be collected into the vacuum truck, subsequently drummed, and consolidated with the other wastes. HEPACO personnel will enter the grease interceptor and scrape the walls and floor of any remaining residues.

The next step will be to assess the integrity of the influent and effluent lines to evaluate whether there is a potential for additional risk of soil contamination that arises from the use of a jet rod cleaning unit in these lines. If voids or breaches are observed, then the line with the observed fault will be excavated and replaced, as necessary.

The effluent plumbing system for the shopping center is covered by 4 inches of asphalt. HEPACO will clean the line from the grease interceptor using a jet rod machine from the grease interceptor to the furthest point that can be reached with the unit. The jet rod is designed to pressurize a liquid cleaning solution and pull it back to the point where the jet rod was placed inside the pipeline. HEPACO will use a degreasing cleaner to wash the discharge line from the furthest point that can be reached back to the tank. This should adequately decontaminate the PVC lines for purposes of eliminating the source of PCB entering the public sewer system.

Confirmation, wipe samples from the influent and effluent lines will be collected consistent with US EPA policy (US EPA, Wipe Sampling and Double Wash/Rinse Cleanup as Recommended by the Environmental Protection Agency PCB Spill Cleanup Policy, June 23, 1987, Revised and Clarified on April 18, 1991) and samples will be submitted to Pace Analytical Laboratory, Inc. for PCB analysis by US EPA Method 8082A.

Once the integrity of the influent line has been verified, the jet rod cleaner will be used to clean from the influent line from the final clean out inside the building to the tie with the temporary by-pass line. To do this, the first action will be to uncover the temporary by-pass line. The jet rod will be used to clean approximately 10 feet up the influent line to the grease interceptor. Once cleaning is complete, new PVC pipe will be used to reconnect for temporary use. The store can resume normal activity levels once this line is connected again. The section of temporary by-pass line removed will be disposed of as PCB remediation waste.



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After the influent line is cleaned, the effluent line will be cleaned. The jet rod unit will be inserted into the effluent line as far as it will go and the line will be cleaned back to the grease interceptor.

Once the effluent line is cleaned and the walls are scraped, the inside of the tank will be cleaned using a pressurized sprayer and a degreaser will be applied to remove the oily residue from the walls. After sufficient contact time, the walls will be rinsed with water to remove the degreaser. The cleaning step will be repeated, as necessary, until the walls of the unit appear to be free of accumulated oils and greases.

Liquids generated by the cleaning process will be collected into the vacuum truck and subsequently drummed for proper disposal with other fluids that are removed from the grease interceptor.

Samples of the concrete will be collected using a 1 inch drill bit in a hammer drill. Care will be taken to limit the depth of the drilled hole to ½ inch or less of depth. Each sample will require collection of at least 30 grams of sample. Based on information provided by US EPA regarding core sampling, approximately four holes will be drilled at each sample location in order to collect an adequate amount of sample material. These four holes will be drilled within a six inch diameter circle marked at each sample location and the collected material will be composited to form one sample.

### **Future Grease Interceptor Replacement**

Prior to removal of the grease interceptor and confined space entry will be required to sample the influent and effluent lines to determine if any PCB contamination is present.

In order to demolish the tank a backhoe mounted jack hammer tip or excavator mounted jack hammer will be required. The tank will be broken into pieces small enough to be staged in a hazardous waste roll-off container for disposal in accordance with disposal procedures described in the following section.

Once the tank is out of the excavation, any visibly contaminated soils will be excavated and placed into the hazardous waste roll-off and staged for disposal in accordance with disposal procedures described in the following section.

Upon removal of the grease interceptor, confirmation sampling will be conducted on the underlying soils to confirm PCB concentrations are less than one ppm (1.0



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mg/kg). Two grab samples will be collected from the soil at the bottom of the pit. Two soil samples will also be collected from each of the four sidewalls of the pit. The excavator will excavate soils from the bottom and sidewalls and each of the samples will be collected from the excavator scoop. Sampling personnel will not enter the pit for sample collection. Samples will be submitted to Pace Analytical Laboratory, Inc. for PCB analysis by US EPA Method 8082A.

The excavation will be covered and barricaded to prevent unauthorized entry and the excavation will be left open until the results from the confirmation samples are received. Excavation of bottom and sidewall soils will continue until confirmation samples result in PCB concentrations less than one ppm.

Upon confirmation of PCB concentrations in the soils and inlet line are below one ppm, a new grease interceptor will be installed in the same location by a plumbing contractor. The temporary by-pass will be disconnected and the inlet line will be routed to the new grease interceptor.

### **Influent and Effluent Lines**

If the confirmation sample from the influent or discharge line from the grease interceptor shows that the line is not adequately clean (wipe test greater than 10  $\mu\text{g}/100\text{ cm}^2$ ), the concrete over the line will be cut and removed and the line will be demolished and replaced. Removal of the line will be done by HEPACO and replacement of the line will be made by a licensed plumbing contractor.

### **Equipment Decontamination Procedures**

Sampling equipment decontamination will be performed in accordance with procedures described in the site Health and Safety Plan. Equipment will be decontaminated in accordance with HEPACO procedures and consistent with US EPA policy (US EPA, Wipe Sampling and Double Wash/Rinse Cleanup as Recommended by the Environmental Protection Agency PCB Spill Cleanup Policy, June 23, 1987, Revised and Clarified on April 18, 1991). Disposable personnel protective equipment, sampling equipment and related disposal items will be placed into a plastic trash bag and placed into a steel drum, labeled and sent for disposal with the other PCB remediation waste associated with this site.

### **PCB Derived Waste Disposal Procedures**

PCB waste will be transferred to 55-gallon drums and held until confirmation samples demonstrate that sufficient soils have been removed and the excavation is ready for replacement of the grease interceptor. Demolition materials will be contained in a plastic-lined hazardous waste roll-off container. Investigation and



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demolition waste is assumed to contain PCB concentrations greater than 50 ppm for disposal purposes. Bulk PCB remediation waste at concentrations of 50 ppm or greater must be disposed of in a RCRA Sec. 3004 or 3006 permitted hazardous waste landfill or an approved PCB disposal facility (e.g., incinerator, chemical waste landfill; an approved alternate disposal method or coordinated approval - see 40 CFR §761 .61(a)(5)(i)(B)(2)(iii)). A Uniform Hazardous Waste Manifest must accompany PCB waste at concentrations of 50 ppm or greater ( $\geq 50$  ppm) to any off-site storage or disposal facilities (see 40 CFR §761 .208), except as provided at 40 CFR §§761 .61(a)(5)(i)(B)(2)(ii) and 761.61(a)(5)(v)(A). A signed copy of each manifest must be retained for a period of three years (40 CFR §761 .209(a)).

Waste derived from the grease interceptor removal and closure will be disposed of by Chemical Waste Management in Emelle, Alabama.

Respectfully submitted,  
**HEPACO, LLC**

Chad Edwards  
Project Manager



## Pearce, Jennifer

---

**From:** Feely, Ken  
**Sent:** Thursday, February 13, 2014 3:22 PM  
**To:** cedwards@hepaco.com  
**Cc:** McCurry, Doug  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Chad,

A few questions/observations before I compile comments:

- Is it a foregone conclusion that the GI will be removed and replaced? If so, and all IDW and demo debris will be disposed of at Emelle, the concrete sampling is not necessary. If decontamination of the GI is to be attempted, then a 24-hour integrity test of the tank should be performed to determine if the tank is leaking (most of them we've dealt with to date seem to be). If leaking, replacement will likely be necessary in order to assess potential soil contamination.
- Who is the owner of the property (Delhaize America)? Just wondered if you're working for the property owner or Food Lion.
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- Liquid PCB remediation waste should be shipped for incineration immediately as the regulations provide no option for temporary on-site storage. If immediate shipment is not practicable, EPA recommends securing the waste in some sort of secondary containment. Bulk PCB remediation waste and PCB cleanup waste can be stored temporarily on-site in containers for up to 30 days. EPA recommends that these also be secured and inspected daily.
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I'm approaching the end of my work day here and will be out of the office tomorrow. If you have time to respond to the above, perhaps we can discuss next Monday morning.

Have a good weekend.

---

**Ken Feely** | Regional PCB Program Coordinator  
USEPA Region 4 | Atlanta Federal Center 9T25  
61 Forsyth Street SW | Atlanta GA 30303-8960  
Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

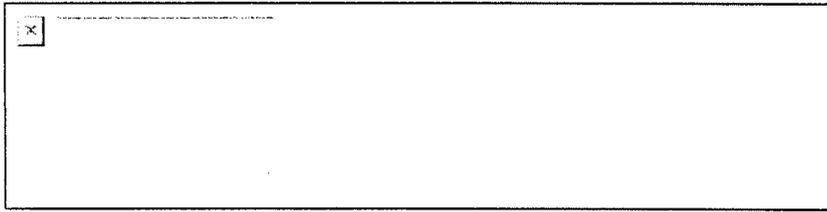
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**From:** Chad Edwards [mailto:[cedwards@hepaco.com](mailto:cedwards@hepaco.com)]  
**Sent:** Wednesday, February 12, 2014 12:18 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Mr. Feely,

I have attached the proposed Grease Interceptor Work Plan for your review. Please let me know if you have any comments/concerns or need any additional information.

Thank you and safe travels.



**Chad B. Edwards**

Project Manager  
HEPACO, LLC  
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Charlotte, NC 28221-6308  
Telephone: 704-598-9782  
Fax: 704-598-9224

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Office: 404.562.8512 | Fax: 404.562.9964 | [feely.ken@epa.gov](mailto:feely.ken@epa.gov)

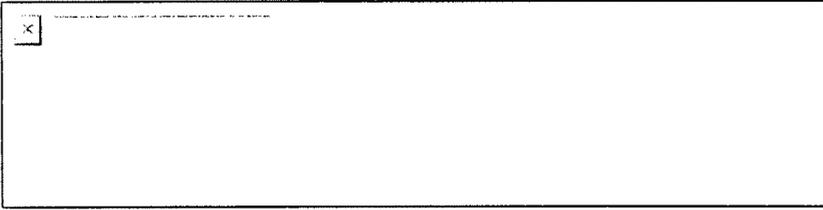
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**Sent:** Thursday, February 13, 2014 3:39 PM  
**To:** Feely, Ken  
**Cc:** 'Hawks, Eddie'  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

Ken,

- The GI will be removed. The levels that Mecklenburg County requires are a non-detect for PCB's.
- We are working for Food Lion which is under the " Delhaize America" umbrella
- Orange Appeal w/delimeamine by Marchem Products

Thank you and I will be in touch Monday morning.



**Chad B. Edwards**  
Project Manager  
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**Sent:** Thursday, February 13, 2014 3:22 PM  
**To:** cedwards@hepaco.com  
**Cc:** McCurry, Doug  
**Subject:** RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC

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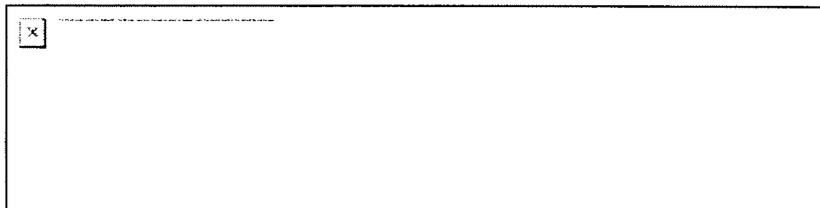
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**Pearce, Jennifer**

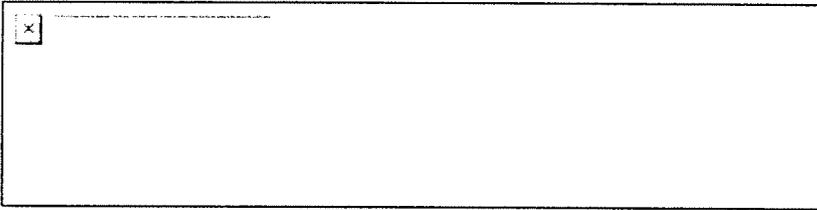
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**From:** Chad Edwards <cedwards@hepaco.com>  
**Sent:** Tuesday, February 18, 2014 7:12 PM  
**To:** Feely, Ken  
**Subject:** Update on Charlotte, NC Foodlion Plan

Mr. Feely,

I hope you had a good weekend and I wanted to follow-up on the comments regarding the work plan from last week. Please let me know if you have any additional comments/concerns/questions that you may have. I will be available by email tomorrow for the majority of the day with limited phone access due to meetings.

Thank you again and I look forward to hearing your response.



**Chad B. Edwards**  
Project Manager  
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## Pearce, Jennifer

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**From:** Feely, Ken  
**Sent:** Friday, June 13, 2014 7:55 AM  
**To:** Pearce, Jennifer  
**Cc:** Caplan, Robert W.; McCurry, Doug  
**Subject:** FW: : FOIA Assignment for EPA-R4-2014-007268  
**Attachments:** Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; FW: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; Liquid & Concrete Dust Analytical Results; RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; Update on Charlotte, NC Foodlion Plan; RE: Food Lion # 2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; RE: Food Lion #2217 PCB Illegal Dump Removal Work Plan-Charlotte, NC; Untitled; RE: ; FW:

**From:** Feely, Ken  
**Sent:** Thursday, June 12, 2014 4:11 PM  
**To:** Caplan, Robert W.  
**Subject:** : FOIA Assignment for EPA-R4-2014-007268

Jennifer,

Here's all the correspondence that is responsive to the FOIA request.